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February 13, 2019

**Via CM/ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: PennEast Pipeline Company, LLC v. Michael F. Voorhees, et al**  
**75 Alexauken Creek Road, West Amwell Township, NJ (the "Property")**  
**Case No. 18-cv-1938-BRM-DEA**


Dear Judge Martinotti:

This firm has been retained by Defendant, JPMorgan Chase Bank, N.A. ("Chase"), for the purpose of disclaiming any interest in the "just compensation" to be paid in connection with this condemnation matter.

Chase's interest in the Property stems from a mortgage granted by Michael F. Voorhees and Elizabeth O'Donnell dated November 24, 2006, which mortgage was recorded in the Hunterdon County Clerk's Office on December 11, 2006, in Book 3090, Page 737 (the "Mortgage"). While the Mortgage remains in full force and effect as a valid lien on the property – and Chase reserves its right to defend that position notwithstanding this disclaimer – Chase hereby elects to allow any "just compensation" awarded in this matter to be paid to the property owner, or any other party as the Court may direct.

As a result of Chase's disclaimer, and because Chase has not previously appeared or otherwise participated in this matter, we do not intend to appear at the case management conference scheduled for tomorrow morning. To the extent the Court would have preferred that we entered our appearance earlier and formally requested to be excused from the conference, we apologize for any inconvenience and note that we were only recently retained. However, rather than remain silent, we thought the parties and the Court would appreciate receiving this disclaimer, even at this late date.

Respectfully submitted,  
McCalla Raymer Leibert Pierce, LLC

By:   
Richard P. Haber

cc: All counsel of record (via CM/ECF)  
Michael F. Voorhees, pro se (via regular mail)